

**KML LAW GROUP, P.C.**  
**A PROFESSIONAL CORPORATION INCORPORATED IN PENNSYLVANIA**  
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April 8, 2021

The Honorable Jerrold N. Poslusny, Jr., U.S.B.J.  
Courtroom # 4-C  
400 Cooper Street, 4<sup>th</sup> Floor  
Camden, NJ 08101

RE: Michael D. Goldfinger  
Case No. 20-23959-JNP  
Premises: 6S Garfield Avenue, Wenonah, NJ 08090  
Secured Creditor: PNC Bank, National Association

Dear Judge Poslusny,

This office represents PNC Bank, National Association (“Secured Creditor”), holder of a mortgage on real property located at 6S Garfield Avenue, Wenonah, NJ 08090. Please accept this letter in response to Debtor’s motion to sell the subject property.

Secured Creditor has reviewed the current motion to sell and the proposed form of order filed with the Court. Secured Creditor does not object to the motion or the proposed order in its current form. However, should the proposed order be revised, or if the underlying facts supporting the motion should change, Secured Creditor reserves its right to object to the motion.

Secured Creditor’s response, in its present form, is not an objection to the current motion to sell the subject property. The undersigned does not intend to appear to prosecute an objection at this time unless the proposed order is amended to a form deemed objectionable.

Respectfully,  
KML LAW GROUP, P.C.

/s/ Denise Carlon, Esq.  
Denise Carlon, Esquire  
dcarlon@kmlawgroup.com  
Attorney for PNC Bank, National Association

cc: Ronald Norman, Esq.  
Isabel Balboa, Chapter 13 Trustee  
Michael Goldfinger, Debtor